



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/MAA/ANR
F. #2021R00667

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 13, 2024

By ECF

The Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Quanzhong An, et al.
Criminal Docket No. 22-460 (S-1) (KAM)

Dear Judge Matsumoto:

The government respectfully submits this letter to request clarification regarding upcoming trial deadlines, in light of the Court's May 7, 2024 decision severing the trials of the counts relating to the repatriation scheme from the count relating to the money laundering scheme (Dkt. No 171).¹

The government is prepared to proceed to trial on July 1, 2024 on Counts One through Seven of the superseding indictment; the government has discussed with counsel for Quanzhong An and Guangyang An and understand they agree with proceeding to trial on Counts One through Seven on that date. The government accordingly writes to confirm that the deadlines for the July 1 trial set forth in the Court's April 29, 2024 order (Dkt. No 168) – which include May 20, 2024 deadlines for the exhibit lists, witness lists, and expert disclosures, and a May 23, 2024 deadline for pre-trial motions including motions in limine and pursuant to Federal Rule of

¹ In its decision, the Court severed the trial on Count Eight of the indictment from the trial on Counts One through Seven of the indictment. The grand jury subsequently, on May 8, 2024, returned a superseding indictment adding a bank fraud conspiracy count. (Dkt. No. 173.) The government assumes that, given the reasoning set forth in the Court's decision, counts relating to the repatriation scheme (Counts One through Seven of the superseding indictment) will be tried in one trial and counts relating to the defendants' financial fraud (Counts Eight and Nine of the superseding indictment) will be tried in the separate trial.

Evidence 404(b) – do not apply to Counts Eight and Nine of the superseding indictment, given that they will not be at issue in the July 1 trial.

The government will confer with defense counsel and will be prepared to further address the schedule for the trial on Counts Eight and Nine during the upcoming status conference scheduled for May 17, 2024.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: Clerk of Court (KAM) (by ECF and Email)
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